

U.S. Department
of Transportation

United States
Coast Guard



**Marine Safety Office
San Francisco Bay**

Facility Response Plan Preparation Guide

Designed for mobile transfer facilities regulated
under 33 CFR Part 154 Subpart F

May 1997

Introduction

This guide is designed to assist operators of small mobile transfer facilities handling non-persistent oils such as diesel, gasoline, or oily bilge water develop facility response plans that meet U.S. Coast Guard regulations in Title 33 Code of Federal Regulations (CFR) Part 154, Subpart F. Mobile transfer facilities include tank trucks, vacuum trucks, baker tanks, or similar portable containers and associated piping or hoses.

The regulations in 33 CFR Part 154 apply primarily to large marine oil terminals; applying them to small, mobile facilities can be difficult and confusing. This guide addresses issues that you, the mobile facility operator, should focus on while developing your response plan. Keeping this focus should speed up the plan development and review processes, which in turn should expedite Coast Guard certification of your facility.

This guide is a reference document; it is not a substitute for the regulations. You must read and understand the regulations, and ensure that your plan meets all applicable requirements. In addition, this guide addresses only federal regulations; California state regulations are not discussed. Depending on your operations, you may have to comply with California Department of Fish and Game, Office of Oil Spill Prevention and Response (OSPR) regulations. Although many of the federal and state regulations are similar, there are important differences. You should contact OSPR at (916) 445-0045 with any questions regarding state regulations.

Response plan submission requirements

You must prepare and submit a response plan to the Coast Guard Captain of the Port if you own or operate a mobile facility and transfer oil to or from a vessel with a total oil capacity of 250 barrels (approximately 10,500 gallons) or more. Some people confuse the capacity of the vessel with the amount of oil actually transferred. Whether or not you must submit a plan depends on the oil capacity of vessels you transfer product to or from, not on the amount of product transferred.

For example:

A transfer of 100 gallons of oily water from a vessel with a total oil capacity of 20,000 gallons is a regulated transfer. You must have a response plan on file with the Captain of the Port in order to conduct this transfer.

However, a transfer of 9,000 gallons of diesel to a vessel with a total oil capacity of 9,500 gallons is not a regulated transfer. You are not required to develop and submit a response plan to the Captain of the Port in order to conduct this transfer.

You may not transfer oil to or from a vessel with an oil capacity of 250 barrels or more unless you are **operating in full compliance with a submitted response plan**. You must submit a complete response plan to the Captain of the Port at least 60 days prior to conducting your first regulated transfer.

The Captain of the Port will review your plan to ensure minimum requirements are met. You are responsible for ensuring that your plan meets applicable regulations. The Captain of the Port will notify you if plan corrections are necessary, and will usually give you 30-60 days to make the corrections. The Captain of the Port may impose operating restrictions on your facility if you do not make timely corrections.

Tip: Refer to 33 CFR Part 154.1025 for more information on operating restrictions.

Benefits of the response planning process

Your response plan is your document, not the Coast Guard's document. Although you are required by regulation to develop a response plan, you should view the plan development process as a vital part of your company's business plan. The regulations in 33 CFR Part 154 Subpart F were implemented to fulfill the mandates of the Oil Pollution Act of 1990 (OPA 90). OPA 90 recognized that while everyone should strive to prevent pollution, oil spills will occur, and companies should prepare to respond to spills.

Developing and maintaining a response plan will prepare your company to respond to an oil spill. If a spill originates from your mobile transfer

facility, you are responsible for cleaning up the spill under federal pollution response laws. The more prepared you are to respond, the better off you will be in the event of a spill. Good preparation may save thousands of dollars in cleanup and liability costs, and will minimize environmental damage.

Plan development includes more than just writing a plan. It includes collecting information, developing training programs, identifying priorities, assigning responsibilities, and making other critical management decisions. This overall process is just as valuable as the written plan itself, and should not stop once a plan is submitted. Regular maintenance of your plan through exercises and annual reviews will keep the process alive and maximize your preparedness. Chapter 3 discusses plan maintenance issues in detail.

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Getting Started

This chapter introduces you to basic response planning concepts and tasks. You should become familiar with these concepts and complete these preliminary tasks before you start writing a plan. Topics addressed include:

- ☐ Reviewing key definitions
- ☐ Classifying your facility
- ☐ Identifying a qualified individual
- ☐ Ensuring the availability of response resources

Reviewing key definitions

There are several technical terms used in the response planning field. You should develop a working knowledge of these terms before you begin writing your plan. This section defines the most important terms; make sure you review the complete list of terms and definitions in 33 CFR Part 154.1020.

- *Area Contingency Plan* is a regional plan designed to prepare a local port community to respond to a worst case oil spill from a vessel or facility. Area Contingency Plans are prepared by Area Committees; Area Committees include representatives from federal, state, and local agencies as well as industry and private organizations. There are three Area Contingency Plans for the Captain of the Port San Francisco zone: the North Coast plan, the San Francisco Bay and Delta plan, and the Central Coast plan.
- *Average most probable discharge* is an oil spill of the lesser of 50

barrels or 1 percent of the volume of your worst case discharge.

- *Captain of the Port zone* is an area of responsibility outlined in 33 CFR Part 3 that specifies the extent of the Coast Guard's geographical jurisdiction. The Captain of the Port San Francisco zone encompasses navigable waterways in the State of California from the Monterey County/San Luis Obispo County line north to the California/Oregon border.
- *Federal On-Scene Coordinator* is the official predesignated by the Environmental Protection Agency or the U.S. Coast Guard to coordinate and direct oil spill response operations. The Captain of the Port San Francisco Bay is the predesignated On-Scene Coordinator for coastal waters in Northern California.
- *Fish and wildlife and sensitive environments* are areas of environmental or economic importance and are usually identified by a legal designation or in an Area Contingency Plan. Examples include parks, marine sanctuaries, wildlife refuges, recreational areas, and historical sites.
- *Maximum most probable discharge* is an oil spill of the lesser of 1200 barrels or 10 percent of the volume of the worst case discharge.
- *Oil* includes oil of any kind such as petroleum, fuel oil, sludge, oil refuse, oil mixed with wastes, and vegetable oil.
- *Oil spill removal organization (OSRO)* is an organization that provides response resources such as booms, skimmers, boats, and trained personnel.
- *Substantial harm facility* is a facility that could reasonably be expected to cause harm to the environment by discharging oil into or on the navigable waters.
- *Worst case discharge* means the loss of the entire contents of the container in which the oil is transported or stored in adverse weather conditions.

Classifying your facility

Mobile transfer facilities are normally classified as substantial harm facilities by the Captain of the Port. Substantial harm facilities pose less of a pollution risk than significant and substantial harm facilities, so the planning requirements for these facilities are less stringent. The Captain of the Port may change a facility's classification depending on the type and quantity of oil handled, spill history, and the proximity of transfer locations to water supply intakes or environmentally sensitive areas.

Before proceeding with the response plan development process, verify your facility's classification with the Captain of the Port.

Tip: For more information on facility classification, refer to 33 CFR Part 154.1016.

Identifying a qualified individual

You must designate a qualified individual and at least one alternate qualified individual. The qualified individual or alternate must be available 24 hours a day and must be able to arrive at a transfer location in a reasonable amount of time. Your qualified individual and alternate must:

- Reside in the United States
- Speak fluent English
- Know the contents of your facility response plan
- Know their responsibilities under your response plan

As a facility owner or operator, you are responsible for ensuring that your qualified individual and alternate have full authority to conduct the following activities:

- Activate and contract with an Oil Spill Removal Organization
- Liaison with the Federal On-Scene Coordinator
- Obligate funds necessary to carry out an oil spill response

Tip: Refer to 33 CFR Part 154.1026 for more information about qualified individuals.

Ensuring the availability of response resources

You must ensure the availability of oil spill response resources in your plan. Use one or any combination of the following methods to ensure availability:

- **A written agreement with an Oil Spill Removal Organization.** The agreement must identify and ensure the availability of necessary equipment and personnel within stipulated response times in specified geographic areas.

Note: The written agreement may be a contract or other approved means. Refer to 33 CFR Part 154.1028 for further information regarding other approved means.

- **Written certification by the facility owner or operator regarding the availability of facility personnel and equipment.** The certification must state that applicable personnel and equipment are owned, operated, or under the direct control of the facility owner or operator and are available within stipulated response times in specified geographic areas.
- **Active membership in a local or regional oil spill removal organization or cooperative.** This organization must identify personnel and equipment that are available to respond to a discharge within stipulated response times in specified geographic areas.

Include copies of contracts or similar documents in your response plan. This information must be available for inspection by the Captain of the Port at all times.

Writing the Plan

This chapter guides you through a step-by-step plan development process. Topics addressed include:

- ☐ Plan formatting
- ☐ Introduction and plan content
- ☐ Emergency response actions
- ☐ Training and exercises
- ☐ Review and update procedures
- ☐ Appendices

Plan formatting

Keep the following rules in mind as you write and organize your plan:

- Write the plan in English
- Organize the plan in the order specified in 33 CFR Part 154.1030
- Include easy to find markers that identify each section
- Include sections or information required by other agencies, if applicable

Note: If you add additional information not required by Coast Guard regulations to your plan, you must include a cross reference that identifies the location of the sections required by 33 CFR Part 154 Subpart F.

Introduction and plan content

This section should be the first section in your plan, and should include:

- A table of contents
- A record of changes page
- The facility's name, address, city, county, state, ZIP code, telephone number, and FAX number.

Note: Include a mailing address if it is different from the street address.

- The name, address, and 24-hour contact information for the facility owner or operator.

For example

Name and address of mobile transfer facility

Name of facility: Toad's Oil Company
Street Address: 1234 Wild Road, San Francisco, CA 94566
Mailing Address: P.O. Box 8888, San Francisco, CA 94566
County: San Francisco
Telephone: (415) 123-4567
Fax: (415) 765-4321

Facility owner information

Name: Toad Johnson
Address: 1234 Wild Toad Road, San Francisco, CA 94566
Telephone: (415) 123-4567
Pager: (415) 999-8888

Emergency response actions

This section of your plan must include the following subsections:

Notification procedures

List the persons or organizations you must notify in the event of an oil spill from your facility. At a minimum, the list should include:

- Facility response personnel identified in the response plan
- Oil spill removal organization(s)
- Qualified individual and alternate
- Federal, state, or local agencies, as required

Sample notification form

Qualified Individual

Toad Johnson	Phone #	Pager #
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Alternate Qualified Individual

Frog Johnson	Phone #	Pager #
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Facility Response Personnel

Name	Phone/Pager Number	Role
<i>List all applicable personnel</i>		

Oil Spill Removal Organization:

Clean It Up Company	Phone 1-800-BIG-SPIL
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Federal, State, and Local Agencies

National Response Center	1-800-424-8802
Coast Guard MSO San Francisco	(510) 437-3073
California OES	1-800-852-7550
CA Dept of Fish and Game	(707) 944-2443
<i>Others as appropriate</i>	

Include an information on discharge form in this subsection. The form must include notification of the National Response Center and a statement that it is not necessary to wait until all information is available before making initial notifications. Response agencies will request the information on this form during initial and follow-up notifications.

Sample information on discharge form				
(A) Reporting party		(B) Suspected responsible party		
Name:		Name:		
Phone:		Phone:		
Company		Company		
Position		Organization Type		
Address		(private, public, etc.)		
City, State, Zip		City, State, Zip		
It is not necessary to wait for all information before calling the National Response Center (1-800-424-8802)				
Were materials discharged (Y/N)?				
Calling for responsible party (Y/N)?				
		<u>Incident Description</u>		
Source and/or cause of incident:				
Date and time:				
Incident address/location:			Nearest city:	
Distance from city:				
Storage tank container type:			Aboveground (Y/N)?	
Below ground (Y/N)?			Unknown	
<u>Facility capacity</u>				
Tank capacity:				
Latitude degrees:				
Longitude degrees:				
Mile post or river mile:				
<u>Materials</u>				
Discharge unit or quantity:		Measure:	Discharged material:	
Quantity in water:				
<u>Response Action</u>				
Actions taken to correct or mitigate incident:				
<u>Impact</u>				
Number of injuries:		Number of fatalities:		
Evacuations necessary?		Number evacuated:		
Damage?		Dollar amount of damage:		
<u>Additional Information</u>				
Any information about the incident not recorded elsewhere in the report.				
<u>Caller Notifications</u>				
USCG	EPA	STATE	LOCAL	OTHER

Spill mitigation procedures

This subsection must identify the volume and group of oil for the following spill scenarios from your facility.

- Average most probable discharge
- Maximum most probable discharge
- Worst case discharge

For example

Toad's Oil Company operates one tank truck with a total oil capacity of 5,000 gallons. Discharge calculations are based on this figure. The company transfers diesel exclusively, so the oil group type is non-persistent.

Discharge type	Non-persistent oil group
Average most probable	50 gallons (1% of worst case)
Maximum most probable	500 gallons (10% of worst case)
Worst case	5,000 gallons

In addition, this subsection must include procedures that facility personnel will follow to mitigate or prevent a discharge of oil involving the following scenarios:

- Hose failure
- Tank overfill
- Tank failure
- Explosion or fire
- Equipment failure (pumping system failure, relief valve failure, etc.)

Sample spill mitigation and prevention procedures

Hose failure

1. Stop the transfer operation.
2. Disconnect and remove the hose (if safe).
3. Notify coworker and ship personnel.
4. Notify Toad's Oil dispatch; dispatch will notify response contractor, NRC, etc.
5. Place absorbent pads on and around the spill.
6. If feasible, use a vacuum truck to collect spilled product.

Tank overfill

1. Stop the transfer operation.
2. Notify coworker and ship personnel.
3. Notify Toad's Oil dispatch; dispatch will notify response contractor, NRC, etc.
4. Place absorbent pads on and around the spill.
5. If feasible, use a vacuum truck to collect spilled product.

Tank failure

1. Stop the transfer operation.
2. Stop the flow (if possible).
3. Notify coworker and ship personnel.
4. Notify Toad's Oil dispatch; dispatch will notify response contractor, NRC, etc.
5. Place absorbent pads on and around the spill.
6. Place boom around tank/spill area.
7. If feasible, use a vacuum truck to collect spilled product.

Explosion or fire

1. Stop the transfer operation.
2. Notify coworker and ship personnel.
3. Notify the fire department.
4. Notify Toad's Oil dispatch.
5. Attempt fire fighting with extinguishers if safe.
6. Place absorbent pads on and around the spill.

Equipment failure

1. Stop the transfer operation.
2. Notify coworker and ship personnel.
3. Notify Toad's Oil dispatch.
4. Place absorbent pads on and around the spill.

Include a list of response equipment and the responsibilities of facility personnel to respond to an average most probable discharge in this subsection as well. Mobile facility operators must, at a minimum, ensure the availability of the following response equipment:

- At least 200 feet of containment boom and the means of deploying and anchoring the boom at the spill site within one hour of detection.
- Adequate sorbent materials for an initial response to an average most probable discharge at the spill site within one hour of detection.
- Oil recovery devices and recovered oil storage capacity at the spill site within two hours of detection.

Important note: It is your responsibility to ensure that your facility has adequate resources on hand to initiate an immediate response. Most mobile facility operators bring containment boom and sorbent materials to each transfer location. Relying on an oil spill response organization to meet the one hour time requirement may be risky depending on the transfer location and the proximity of the organization's equipment to this location. Heavy traffic, especially in the immediate Bay Area, can cause significant delays. Some oil spill response organizations have "on call" programs and can guarantee a one hour response time. Others do not provide guarantees. The Captain of the Port may conduct unannounced exercises of your facility to verify your average most probable discharge equipment capabilities.

Response activities

This subsection of your plan must include the following information:

- The responsibilities of facility personnel to initiate and supervise a response pending the arrival of the qualified individual
- The responsibilities and authorities of the qualified individual and the alternate qualified individual
- The identity and capabilities of oil spill removal organizations to respond to a worst case discharge

Tip: Use Appendix C to 33 CFR Part 154 to identify and evaluate required response resources for facility response plans.

Sample response activities

Facility personnel responsibilities

1. Stop the transfer
2. Notify coworker and ship personnel
3. Notify Toad's Oil dispatch; dispatch will notify NRC, OES, etc.
4. Place absorbent pads over and around the spill

Qualified individual and alternative responsibilities

- Activate and contract with oil spill removal organizations
- Act as liaison with the Federal On-Scene Coordinator
- Obligate funds required to carry out response activities

Oil Spill Removal Organization

Clean It Up Company is Toad Oil Company's primary oil spill removal organization. The 24-hour phone number for Clean It Up is 1-800 BIG SPIL. Clean It Up has the resources and personnel to respond to the following Toad Oil Company spill scenarios:

- Average most probable discharge (50 gallons)
- Maximum most probable discharge (500 gallons)
- Worst case discharge (5000 gallons)

Clean It Up Company does not have an oil spill removal organization classification from the Coast Guard. The equipment and personnel resources available to Toad's Oil Company through Clean It Up Company are listed in Appendix 3 of Toad's Oil Company's response plan.

Sensitive environments

Sensitive environments, referred to as "fish and wildlife and sensitive environments" in the regulations, are areas of economic importance and environmental sensitivity. Sensitive environments are identified in the applicable Area Contingency Plan; sensitive environment information in your facility response plan must be consistent with the applicable Area Contingency Plan. Incorporate changes to sensitive environment information in an Area Contingency Plan into your facility response plan when you conduct your annual plan review.

For transfer locations in the San Francisco Bay and Delta region, refer to the *San Francisco Bay and Delta Area Contingency Plan* for sensitive site information. For transfer locations in the Humboldt Bay Area, refer to the *North Coast Area Contingency Plan*. For transfer locations in the Monterey Bay Area, refer to the *Central Coast Area Contingency Plan*.

Note: Sensitive environment information is available on line from the Area Contingency Planning Webpage at “<http://www.tcpet.uscg.mil/msosf>.” If you do not have Internet access, you can obtain copies of relevant sensitive site information by calling the Facility Inspection Branch at (510) 437-3073.

Include the following information about sensitive environments in your plan:

- A list of all potentially affected sensitive environments. Prepare a separate list for each transfer location.
- A description of response actions to protect sensitive environments.
- A map or chart showing the location of all applicable sensitive environments.
- A list of response equipment and personnel available by contract or other approved means to protect sensitive environments.

Important note: Mobile facility operators transferring non-persistent oil such as diesel or oily water must identify sensitive environments 5 miles from a transfer location down current during ebb tide and to the point of maximum tidal influence or 5 miles, whichever is less, during flood tide. To facilitate the development of this section of your plan, you should refer to the recommended response actions and maps included in the applicable Area Contingency Plan.

Sample sensitive site summary sheet**SITE: A-2-234 Alameda Eelgrass Beds**

County: Alameda Latitude: 37° 45' N
USCS 7.5" Quad: Oakland West Longitude: 122° 16' W

Site description:

There are three separate eelgrass beds south of Alameda. The largest bed extends from near the entrance to Ballena Bay to the southerly extension of Park Street in Alameda. Two smaller beds are west of Bay Farm Island off the northwest end of the Oakland Airport runway.

Seasonal concerns:

The eelgrass beds are a top priority all year.

Resources of primary concern:

Oil sticks to eelgrass and is difficult to remove. The beds are an important spawning substrate for herring between November and April. Eelgrass is the sole food source for Black Brant.

Trustee agency/manager/local experts:

California Department of Fish and Game	(415) 688-6357
National Marine Fisheries Service, Tiburon	(415) 435-3145
Tiburon Center	(415) 454-8868
U.S. Army Corps of Engineers	(415) 744-3322

Protection strategy:

Use diversion boom from the Ballena Bay pier to the Bay Farm Island bridge; divert oil downstream to a collection point. Shoreline is mostly mudflats with heavy rocks.

Collection points:

Use a skimmer for waterside pickup.

Access to areas:

There is a boat launch site near the boat slip adjacent to the Bay Farm Island bridge.

Recommended resources:

- 6000' of 18" curtain boom
- 1 weir skimmer
- 1 boat with crew of 3; 18 support personnel

Disposal plan

Describe disposal procedures for recovered oil and oil contaminated debris in this subsection.

Training and Exercises

This section of the plan should describe the training and exercise programs in place to meet the requirements of 33 CFR Parts 154.1050 and 154.1055. Chapter 3 addresses training and exercise program requirements.

Plan review and update procedures

This section should describe the procedures that you will use to review and update your plan. Chapter 3 addresses plan review in detail.

Appendices

Include the following appendices in your plan:

Appendix 1, Facility specific information

This appendix must contain a description of the facility's principal characteristics, including:

- A physical description of the facility including a plan of the facility showing the mooring areas, transfer locations, control stations, locations of safety equipment, and the location and capacities of all piping and storage tanks

Note: Include a diagram of your mobile transfer facility and a basic description of a typical mooring area in this section.

- A list of the sizes, types, and number of vessels that the facility can transfer oil to or from simultaneously
- A list containing information on the oil handled in bulk. Product information must include:

- Generic or chemical name
- Appearance and odor
- Physical and chemical characteristics
- Handling hazards
- Fire fighting procedures

Tip: You can use a material safety data sheet (MSDS) that meets Occupational Safety and Health Administration (OSHA) regulations in 29 CFR Part 1910.1200 or equivalent to fulfill this requirement. If you have MSDS's in your facility operations manual, you can simply reference the applicable operations manual section in this appendix.

Appendix 2, List of contacts

List 24-hour contact information for key individuals and organizations, including:

- The primary and alternative qualified individual
- The primary oil spill removal organization
- The appropriate federal, state, and local officials

Appendix 3, Equipment lists and records

Include the following information in this appendix:

- A list of equipment and facility personnel required to respond to an average most probable discharge

Note: Make sure you list the location of this equipment.

- List all of the major equipment identified in your plan that belongs to an oil spill removal organization(s) that is available, by contract or other approved means, to respond to a maximum most probable or worst case discharge. Include the following information for each piece of equipment:

- The type, make, model, and year of manufacture listed on the nameplate of the equipment
- The effective daily recovery rate for oil recovery devices
- The overall height and type of end connectors for containment boom
- The applicable spill scenario (worst case discharge, maximum most probable discharge, or average most probable discharge)
- The total daily capacity for storage and disposal of recovered oil
- The primary and secondary radio frequencies for communications equipment
- The location
- The date of last inspection

Tip: You can include this equipment information in a separate document as long as the appendix references that document. If your oil spill removal organization is classified by the Coast Guard and its capacity equals or exceeds the response capability needed by your facility, it is not necessary to list the organization's response equipment in the appendix. In this case, simply note the appropriate Coast Guard classification.

Appendix 4, Communications plan

Describe the primary and alternate methods of communication during oil spills. Your communications plan should address all transfer locations identified in the response plan.

Tip: You may refer to communication equipment provided by your oil spill removal organization in the communications plan. This appendix may reference an existing communications plan.

Appendix 5, Site-specific safety and health plan

Describe the safety and health plan that you will implement for any response location. Provide as much detail as is practicable in advance of an actual oil spill.

Tip: You may reference an existing site safety plan prepared to meet OSHA requirements.

Appendix 6, List of acronyms and definitions

List and define acronyms used in your response plan that are unique to your company or that are commonly used by response agencies. Include any definitions that are critical to understanding your response plan.

Maintaining a plan

Just because you finished writing your plan doesn't mean that the response planning process is complete. Plan development is an iterative process. Properly maintaining your plan will enhance your preparedness to respond to an oil spill and will ensure future compliance with the regulations. This chapter discusses key plan maintenance tasks and highlights common problem areas for plan holders. Topics addressed include:

- ☐ Response information required during transfers
- ☐ Training and exercise programs
- ☐ Inspection and maintenance of response resources
- ☐ Plan submission, approval, review, and revision procedures

Response information required during transfers

Mobile facility operators must carry certain response plan-related information with them during transfer operations. Required information includes:

- A description of the response activities for a discharge which may occur during transfer operations
- A list of response resources available to respond to a discharge from the facility
- A contact list for persons and agencies that must be advised of an oil spill from the facility, including the National Response Center

You should retain the above information at your principal place of business as well.

Training program

You must describe your training program for individuals with responsibilities under your response plan. You must also identify the method for training any volunteers or casual laborers used during a response to comply with OSHA requirements in 29 CFR Part 1910.120.

Maintain records to document response plan-related training for facility personnel for 3 years. These records should be available for inspection by Captain of the Port representatives upon request.

Important Note: A common discrepancy observed by Coast Guard facility inspectors during the last 2 years is inadequate response plan training records. Many facility operators have extensive training programs, but neglect to document the training or keep training records on file. The Coast Guard recommends that facility operators maintain a separate file or binder that includes copies of training certificates and other training-related documentation. Make sure this file is available during your annual Coast Guard facility inspection.

You should ensure that the oil spill removal organization(s) you identify in your plan maintains records sufficient to document training of the organization's response personnel. These records should be made available to you, your qualified individual and alternate, and the Coast Guard upon request. The oil spill removal organization must maintain these records for 3 years.

Important Note: The Coast Guard does not require specific response plan-related training elements. You should develop a training program based on your employee's needs, OSHA regulations, and employee roles in the response plan. There is a useful reference guide titled *Training Reference for Oil Spill Response*, published by the Coast Guard, the Research and Special Programs Administration, the Environmental Protection Agency, and the Minerals Management Service, which includes recommended response plan training topics. You may obtain a copy of this document by calling the Facility Inspection Branch at (510) 437-3073.

Exercise Program

Your response plan must describe your company's pollution response exercise program. All exercise programs must include the following exercise types and frequencies:

- Quarterly qualified individual notification exercises
- Annual spill management team tabletop exercises
- Semiannual facility-owned equipment deployment exercises
- Annual oil spill removal organization-owned equipment deployment exercises

Note: Annually, at least one of the exercises listed above must be unannounced. Unannounced means that the people participating in the exercise are not advised in advance of the exact date, time, and scenario of the exercise.

You should design your exercise program so all components of your response plan are exercised at least once every three years.

Tip: For more information on response plan components and exercise types, refer to the National Preparedness for Response Exercise Program (PREP) guidelines. You may obtain a copy of the guidelines by calling the Facility Inspection Branch at (510) 437-3073. Compliance with the PREP guidelines satisfies the exercise requirements in 33 CFR Part 154.1055. The Coast Guard recommends that facility operators at least refer to the PREP guidelines when designing an exercise program, even if they choose not to participate in the PREP program.

Prepare your company to participate in unannounced exercises initiated by the Captain of the Port. Unannounced exercises are designed to test notifications and equipment deployment for a response to an average most probable discharge. Once you participate in a Captain of the Port-initiated unannounced exercise, you are not required to participate in another such exercise for at least 3 years from the exercise date.

You should also prepare your company to participate in Area exercises initiated by the Federal On-Scene Coordinator. Area exercises involve equipment deployment to respond to a scenario designed by a pre-

determined exercise design team. Once you participate in an Area exercise, you are not required to participate in another Area exercise for at least 6 years from the exercise date.

You must document all exercises conducted, and ensure records are maintained at the facility for 3 years. Records must be available for inspection by Coast Guard representatives upon request.

Tip: A common discrepancy observed by Coast Guard facility inspectors during the last 2 years is inadequate exercise documentation. Many facility operators have extensive exercise programs, but neglect to document the exercises or keep records on file. The Coast Guard recommends that facility operators use the sample documentation forms provided in the PREP guidelines. You should maintain a separate file or binder that includes copies of exercise records. Make sure this file is available during your annual Coast Guard facility inspection.

Inspection and maintenance of response resources

You must ensure that all major facility-owned response equipment, including containment booms, skimmers, and vessels, is periodically inspected and maintained in good operating condition in accordance with manufacturer recommendations and best commercial practices.

Note: You are not required to inspect, maintain or document the maintenance of equipment owned and operated by your contracted oil spill removal organization.

For all facility-owned response equipment, the Coast Guard may:

- Verify that the equipment inventories exist as represented
- Verify the existence of maintenance records
- Verify that the maintenance records reflect the actual condition of the equipment
- Inspect and require operational tests of the equipment

Ensure you document all equipment inspection and maintenance. The documentation does not need to be in your response plan; however, it

should be readily available for inspection at all times. Maintain these records for 3 years.

Plan submission, approval, review, and revision procedures

The procedures addressed in this section discuss how to properly submit and update a response plan. Ensure your plan review and revision process is consistent with these procedures.

Plan submission and approval

When you finish writing your plan, you should send one copy to the Captain of the Port for review and filing. The Captain of the Port will retain this copy for reference and for use in the event of an emergency involving your facility. The Coast Guard considers facility response plans proprietary information, and will not share information in the plans with private organizations or individuals without your permission.

All plans are valid for 5 years. At a minimum, you must submit a revised plan once every 5 years. The 5 year period commences on the date you submit your first response plan to the Captain of the Port.

In addition to the Coast Guard, the qualified individual and the alternate qualified individual must maintain a current copy of your response plan. You should also maintain a current copy at the facility where it is readily available to persons conducting transfers.

If the Captain of the Port finds significant discrepancies with your plan, he or she will return the plan to you for correction. You must correct the discrepancies and return the plan to the Captain of the Port within a specified period of time.

Plan review and revision

You must review your plan annually. This review must occur within 1 month of the anniversary date of submission of the plan to the Captain of the Port.

You must submit any revisions you make to your plan to the Captain of the Port and all other plan holders. Along with the revisions, you should submit a cover letter listing all of the revisions to the plan. Note all plan revisions on your plan's record of changes page.

If, after conducting an annual review, you determine that no revisions are necessary, simply indicate the completion of the annual review on your plan's record of changes page.

In addition to the required annual review, you should submit revisions to your response plan when any of the following scenarios occur:

- Changes in the facility's configuration that significantly affect response plan information
- Changes in the type of oil handled by the facility that affect required response resources
- Changes in the name or capabilities of your oil spill removal organization
- Changes in the facility's emergency response procedures
- Changes in the facility's operating area

Important note: If you add new transfer locations to your operating area, you must update your response plan and submit the updates to the Captain of the Port before conducting transfers at these locations.

- Other changes that significantly affect implementation of the plan.

The Captain of the Port may require you to revise your response plan at any time as a result of a compliance inspection if the Captain of the Port determines that the plan does not meet applicable requirements or proved inadequate during an actual pollution incident.